

EXHIBIT A



Your Missouri Courts


Search for Cases by:
[Judicial Links](#) | [eFiling](#) | [Help](#) | [Contact Us](#) | [Print](#)
[GrantedPublicAccess](#) [Logoff SEANPLUTA6](#)

20SL-CC00753 - TRIDENT STEEL CORPORATION V MARK SIFFIN (E-CASE)

Case Header	Parties & Attorneys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
-----------------------------	---	--------------------------------	--	-------------------------------------	-----------------------------	---	---------------------------------	---

This information is provided as a service and is not considered an official court record.

[Click here to eFile on Case](#)

Sort Date Entries: ☐

Descending

Display Options:

[Click here to Respond to Selected Documents](#)
☒ Ascending

- 01/29/2020 ☐ **Judge Assigned**
DIV 21
- ☐ [Pet Filed in Circuit Ct](#)
Petition for Fraudulent Misrepresentation.
- ☐ [Request Filed](#)
Request for Issuance of Summons for Personal Service Outside the State of Missouri.
Filed By: MATTHEW BRIAN VIANELLO
On Behalf Of: TRIDENT STEEL CORPORATION
- ☐ **Filing Info Sheet eFiling**
Filed By: MATTHEW BRIAN VIANELLO
- 02/10/2020 ☐ **Judge/Clerk - Note**
THIS CASE CANNOT BE FURTHER PROCESSED DUE TO MISSING \$.50 FILING FEES. THE FILING FEE FOR SAINT LOUIS COUNTY CIRCUIT-CIVIL CASES IS \$105.50. A TOTAL OF \$105.00 HAS BEEN PAID, WITH A REMAINING BALANCE OF \$0.50. E-FILE A MEMO WITH THE REMAINING \$0.50 FILING FEES SO THE CASE CAN BE FURTHER PROCESSED.
- ☐ [Memorandum Filed](#)
Memorandum.
Filed By: MATTHEW BRIAN VIANELLO
On Behalf Of: TRIDENT STEEL CORPORATION
- ☐ **Note to Clerk eFiling**
Filed By: MATTHEW BRIAN VIANELLO
- 02/19/2020 ☐ [Summ Issd- Circ Pers Serv O/S](#)
Document ID: 20-SMOS-131, for SIFFIN, MARK. Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.
- 06/15/2020 ☐ [Alias Summons Requested](#)
Request for Alias Summons for Personal Service Outside the State of Missouri.
Filed By: MATTHEW BRIAN VIANELLO
On Behalf Of: TRIDENT STEEL CORPORATION
- ☐ [Alias Summons Issued](#)
Document ID: 20-SMOS-511, for SIFFIN, MARK. Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.
- 06/22/2020 ☐ [Notice of Service](#)
Affidavit of Service 2020-06-19.

Filed By: MATTHEW BRIAN VIANELLO**On Behalf Of:** TRIDENT STEEL CORPORATION**06/25/2020** ☐ [Agent Served](#)

Document ID - 20-SMOS-131; Served To - SIFFIN, MARK; Server - ; Served Date - 19-JUN-20; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

TRIDENT STEEL CORPORATION,)	
)	
Plaintiff,)	Case No.
)	
v.)	Div.
)	
MARK SIFFIN,)	
)	
Defendant.)	

PETITION FOR FRAUDULENT MISREPRESENTATION

Trident Steel Corporation ("Trident"), for its petition for fraudulent misrepresentation against Mark Siffin, states:

1. Trident is a Missouri corporation with its principal place of business in St. Louis County, Missouri.
2. Siffin is a resident of the State of New York. At all relevant times, Siffin was the Chief Executive Officer of MDC Texas Energy, LLC, which is located in Midland, Texas.
3. This Court has jurisdiction under Section 506.500.1(3), RSMo., because Siffin committed a tort in Missouri by sending multiple fraudulent misrepresentations to Trident in Missouri.
4. Venue is proper in this Court under Section 508.010.4.
5. From May 2, 2019 to June 28, 2019, MDC Texas Energy, LLC placed ten orders with Trident to purchase \$355,507.55 of tubing.
6. Trident timely delivered each order to MDC Texas Energy, LLC in Midland, Texas. Trident also submitted an invoice with each delivery.

7. Trident's invoices were not being paid, however, so in mid-August, Trident's President, Kevin Beckmann, called Siffin to discuss the amounts owed to Trident.

8. During that conversation, Siffin stated that MDC Texas Energy, LLC would be sending Trident \$150,000 to \$200,000 by mid-September.

9. Beckmann relied on Siffin's statement and agreed that Trident would not commence collection actions at that time.

10. Trident did not receive any payments in mid-September.

11. Beckmann and Siffin spoke again on or around September 27.

12. During that conversation, Siffin stated that MDC Texas Energy, LLC would wire-transfer \$355,507.55 to Trident on or before October 21, 2019.

13. Beckmann relied on Siffin's statement and agreed that Trident would not commence any collection actions at that time.

14. MDC Texas Energy, LLC made no payments on or before October 21, 2019 and has not made any payments since, notwithstanding Siffin's multiple representations to the contrary.

15. MDC Texas Energy, LLC never intended to pay Trident's invoices. Rather, MDC Texas Energy, LLC was simply trying to delay Trident's collection attempts.

16. As MDC Texas Energy, LLC's CEO, Siffin knew that MDC Texas Energy, LLC did not intend to pay Trident's invoices.

17. Siffin made repeated misrepresentations in which he promised that Trident would get paid for the purpose of inducing Trident to delay any attempts to collect the debt owed to Trident by MDC Texas Energy, LLC.

18. Trident's agreements to delay collection activities made in reliance on Siffin's misrepresentations gave MDC Texas Energy, LLC time to prepare a voluntary petition for bankruptcy, which it filed November 8, 2019.

19. But for Siffin's misrepresentations, Trident would have commenced legal actions to collect its debt that are no longer available because of MDC Texas Energy, LLC's bankruptcy filing.

20. Siffin's actions caused Trident damage.

21. Siffin is personally liable for the damage caused to Trident as a result of his fraudulent misrepresentations, regardless of whether he was acting on behalf of MDC Texas Energy, LLC or not.

22. Siffin acted with evil motive or reckless indifference to the rights of Trident, entitling Trident to an award of punitive damages.

WHEREFORE, Trident Steel Corporation requests a judgment in its favor and against Mark Siffin for actual damages in excess of \$25,000, punitive damages, pre and post-judgment interest, costs, and for such further relief that is proper under the circumstances.

Respectfully submitted,

JACOBSON PRESS P.C.

/s/ Matt Vianello

Matthew B. Vianello, #63303

222 S. Central Ave., Suite 550

Clayton, Missouri 63105

Phone: 314-899-9789

Fax: 314-899-0282

Vianello@ArchCityLawyers.com

Attorney for Trident Steel Corporation

CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

TRIDENT STEEL CORPORATION,)	
)	
Plaintiff,)	Case No.
)	
v.)	Div.
)	
MARK SIFFIN,)	
)	
Defendant.)	

REQUEST FOR ISSUANCE OF SUMMONS FOR PERSONAL SERVICE
OUTSIDE THE STATE OF MISSOURI

Trident Steel Corporation requests that the Court issue a summons for personal service outside the State of Missouri on the following defendant:

Mark Siffin
375 Park Avenue, Suite 2701
New York, New York 10153

Respectfully submitted,

JACOBSON PRESS P.C.

/s/ Matt Vianello
Matthew B. Vianello, #63303
222 S. Central Ave., Suite 550
Clayton, Missouri 63105
Phone: 314-899-9789
Fax: 314-899-0282
Vianello@ArchCityLawyers.com

Attorney for Trident Steel Corporation

CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

TRIDENT STEEL CORPORATION,)	
)	
Plaintiff,)	Case No. 20SL-CC00753
)	
v.)	Div. 21
)	
MARK SIFFIN,)	
)	
Defendant.)	

MEMORANDUM

This memorandum is being filed in connection with plaintiff's payment of the outstanding filing fee balance.

Respectfully submitted,

JACOBSON PRESS P.C.

/s/ Matt Vianello

Matthew B. Vianello, #63303
222 S. Central Ave., Suite 550
Clayton, Missouri 63105
Phone: 314-899-9789
Fax: 314-899-0282
Vianello@ArchCityLawyers.com



Attorney for Trident Steel Corporation



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: NANCY WATKINS MCLAUGHLIN	Case Number: 20SL-CC00753	(Date File Stamp)
Plaintiff/Petitioner: TRIDENT STEEL CORPORATION	Plaintiff's/Petitioner's Attorney/Address: MATTHEW BRIAN VIANELLO SUITE 150 168 NORTH MERAMEC AVENUE CLAYTON, MO 63105	
Defendant/Respondent: MARK SIFFIN	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105	
Nature of Suit: CC Other Tort		

**Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)**

<p>The State of Missouri to: MARK SIFFIN Alias:</p> <p>375 PARK AVENUE SUITE 2701 NEW YORK, NY 10153</p> <p>COURT SEAL OF</p>  <p>ST. LOUIS COUNTY</p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p>SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.</p> <p>19-FEB-2020 Date Further Information: AD</p>	 Clerk
--	--	--

Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
 - My official title is _____ of _____ County, _____ (state).
 - I have served the above summons by: (check one)
 - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
 - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
 - ☐ other (describe) _____.
- Served at _____ (address)
in _____ County, _____ (state), on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this _____ (day) _____ (month) _____ (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

Service Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

See the following page for directions to clerk and to officer making return on service of summons.

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion and/or petition must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion and/or petition when offered to him, the return shall be prepared to show the offer of the officer to deliver the summons and motion and/or petition and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion and/or petition to the individual personally or by leaving a copy of the summons and motion and/or petition at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and motion and/or petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion and/or petition to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion and/or petition to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. On a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory in the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than sixty days from the date the Defendant/Respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri Court within 30 days after service.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 7900 Carondelet Avenue, 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

TRIDENT STEEL CORPORATION,)	
)	
Plaintiff,)	Case No. 20SL-CC00753
)	
v.)	Div. 21
)	
MARK SIFFIN,)	
)	
Defendant.)	

REQUEST FOR ISSUANCE OF ALIAS SUMMONS FOR
PERSONAL SERVICE OUTSIDE THE STATE OF MISSOURI

Trident Steel Corporation requests that the Court issue an alias summons for personal service outside the State of Missouri on the following defendant:

Mark Siffin
280 E. 96th Street, Suite 210
Indianapolis, Indiana 40240

Respectfully submitted,

JACOBSON PRESS P.C.

/s/ Matt Vianello
Matthew B. Vianello, #63303
222 S. Central Ave., Suite 550
Clayton, Missouri 63105
Phone: 314-899-9789
Fax: 314-899-0282
Vianello@ArchCityLawyers.com

Attorney for Trident Steel Corporation





IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: NANCY WATKINS MCLAUGHLIN	Case Number: 20SL-CC00753
Plaintiff/Petitioner: TRIDENT STEEL CORPORATION	Plaintiff's/Petitioner's Attorney/Address: MATTHEW BRIAN VIANELLO SUITE 150 168 NORTH MERAMEC AVENUE CLAYTON, MO 63105
Defendant/Respondent: MARK SIFFIN	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Other Tort	

(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri
(Except Attachment Action)**

<p>The State of Missouri to: MARK SIFFIN Alias: 280 E 96TH STREET STE 210 INDIANAPOLIS, IN 40240</p> <p>COURT SEAL OF</p>  <p>ST. LOUIS COUNTY</p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p>SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.</p> <p style="text-align: center;"><u>15-JUN-2020</u> Date Further Information: CD</p>	 Clerk
---	---	--

Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
 - My official title is _____ of _____ County, _____ (state).
 - I have served the above summons by: (check one)
 - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
 - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
 - ☐ other (describe) _____.
- Served at _____ (address)
in _____ County, _____ (state), on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this _____ (day) _____ (month) _____ (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

Service Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

See the following page for directions to clerk and to officer making return on service of summons.

Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion and/or petition must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion and/or petition when offered to him, the return shall be prepared to show the offer of the officer to deliver the summons and motion and/or petition and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion and/or petition to the individual personally or by leaving a copy of the summons and motion and/or petition at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and motion and/or petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion and/or petition to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion and/or petition to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. On a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory in the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than sixty days from the date the Defendant/Respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri Court within 30 days after service.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 7900 Carondelet Avenue, 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

Evolution Process Service

5335 N Tacoma Ave Ste 5
Indianapolis, IN 46220

INVOICE: 4609465

Issued: Jun 16, 2020

Sent to: Matt Vianello

Arch City Lawyers

Matt Vianello
222 Central Ave Suite 550
Clayton, MI 63105

PAY TO: Evolution Process Service 5335 N Tacoma Ave Ste 5 Indianapolis, IN 46220

Case: 20SL-CC00753	Plaintiff / Petitioner: Trident Steel Corporation
Job: 4609465 (Trident)	Defendant / Respondent: Mark Siffin

Item	Description	Cost	Quantity	Total
Service Of Process	Mark Siffin 280 E 96th St Suite 210, Indianapolis, IN 46240, Marion	\$55.00	1	\$55.00

All Invoices are due upon receipt.

All past due invoices will be charged a 10% service fee every 30 days.

Total: \$55.00**Amount Paid:** (\$0.00)**Balance Due:** \$55.00

Evolution Process Service • 5335 N Tacoma Ave Ste 5, Indianapolis, IN 46220

Call: 888-317-4540 • Fax: 317-300-7136 • Email: info@evolutionprocessin.com • Visit: www.evolutionprocessin.com

AFFIDAVIT OF SERVICE

Case: 20SL-CC00753	Court: In the 21st Judicial Circuit Court	County: St. Louis, MO	Job: 4609465 (Trident)
Plaintiff / Petitioner: Trident Steel Corporation		Defendant / Respondent: Mark Siffin	
Received by: Evolution Process Service		For: Arch City Lawyers	
To be served upon: Mark Siffin			

I, Raymond Bandy, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Bob Quinn, 280 E 96th St Suite 210, Indianapolis, IN 46240

Manner of Service: Corporation, Jun 19, 2020, 12:05 pm EDT

Documents: Summons and Petition (Received Jun 16, 2020 at 10:53am EDT)

Additional Comments:

1) Unsuccessful Attempt: Jun 17, 2020, 12:33 pm EDT at 280 E 96th St Suite 210, Indianapolis, IN 46240
Unable to access building due to covid-19 virus.

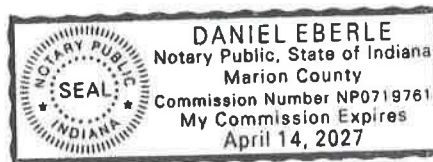
2) Successful Attempt: Jun 19, 2020, 12:05 pm EDT at 280 E 96th St Suite 210, Indianapolis, IN 46240 received by Bob Quinn. Age: 50;
Ethnicity: Caucasian; Gender: Male; Weight: 160; Height: 5'6"; Hair: Brown;
Title is CFO

Raymond Bandy 6/19/20
Raymond Bandy Date

Evolution Process Service
5335 N Tacoma Ave Ste 5
Indianapolis, IN 46220
317-362-0316

Subscribed and sworn to before me by the affiant who is personally known to me.

Daniel Eberle
Notary Public
6.19.20 4.14.27
Date Commission Expires



Evolution Process Service5335 N Tacoma Ave Ste 5
Indianapolis, IN 46220**INVOICE: 4609465**

Issued: Jun 16, 2020

Sent to: Matt Vianello

Arch City LawyersMatt Vianello
222 Central Ave Suite 550
Clayton, MI 63105

PAY TO: Evolution Process Service 5335 N Tacoma Ave Ste 5 Indianapolis, IN 46220

Case: 20SL-CC00753	Plaintiff / Petitioner: Trident Steel Corporation
Job: 4609465 (Trident)	Defendant / Respondent: Mark Siffin

Item	Description	Cost	Quantity	Total
Service Of Process	Mark Siffin 280 E 96th St Suite 210, Indianapolis, IN 46240, Marion	\$55.00	1	\$55.00

All Invoices are due upon receipt.

All past due invoices will be charged a 10% service fee every 30 days.

Total: \$55.00**Amount Paid:** (\$0.00)**Balance Due:** \$55.00

Evolution Process Service • 5335 N Tacoma Ave Ste 5, Indianapolis, IN 46220

Call: 888-317-4540 • Fax: 317-300-7136 • Email: info@evolutionprocessin.com • Visit: www.evolutionprocessin.com

AFFIDAVIT OF SERVICE

Case: 20SL-CC00753	Court: In the 21st Judicial Circuit Court	County: St. Louis, MO	Job: 4609465 (Trident)
Plaintiff / Petitioner: Trident Steel Corporation		Defendant / Respondent: Mark Siffin	
Received by: Evolution Process Service		For: Arch City Lawyers	
To be served upon: Mark Siffin			

I, Raymond Bandy, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Bob Quinn, 280 E 96th St Suite 210, Indianapolis, IN 46240

Manner of Service: Corporation, Jun 19, 2020, 12:05 pm EDT

Documents: Summons and Petition (Received Jun 16, 2020 at 10:53am EDT)

Additional Comments:

1) Unsuccessful Attempt: Jun 17, 2020, 12:33 pm EDT at 280 E 96th St Suite 210, Indianapolis, IN 46240
Unable to access building due to covid-19 virus.

2) Successful Attempt: Jun 19, 2020, 12:05 pm EDT at 280 E 96th St Suite 210, Indianapolis, IN 46240 received by Bob Quinn. Age: 50;
Ethnicity: Caucasian; Gender: Male; Weight: 160; Height: 5'6"; Hair: Brown;
Title is CFO

Raymond Bandy 6/19/20
Raymond Bandy Date

Evolution Process Service
5335 N Tacoma Ave Ste 5
Indianapolis, IN 46220
317-362-0316

Subscribed and sworn to before me by the affiant who is personally known to me.

Daniel Eberle
Notary Public
6.19.20 4.14.27
Date Commission Expires

